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July 18, 2025

**Via ECF**

The Honorable Glenn T. Suddaby, U.S.D.J.  
United States District Court  
Northern District of New York  
James T. Foley Courthouse  
Suite 509  
445 Broadway  
Albany, New York 12207

Re: *Tom v. Delancey Street Group LLC, et al.*  
Docket No.: 1:25-cv-00566-GTS-DJS  
Our File No.: 221.0567050

Dear Judge Suddaby:

I am counsel to Defendant Delancey Street Group LLP (“DSG”) in the above-captioned matter. I have reviewed the court’s Text Order (ECF Doc No. 13) staying the July 21, 2025 deadline for a reply on DSG pending motion to dismiss (ECF Doc No. 8).

Pursuant to the Court’s directive, please accept this letter advising the Court that DSG’s Motion to Dismiss remains pending in its entirety, following Plaintiff’s filing of an Amended Complaint. DSG respectfully requests the ability to supplement the Motion to address newly asserted facts and claims, and respectfully requests that the Court set deadlines for additional briefing, as well as any opposition that Plaintiff may file, and for DSG to file a reply brief.

Thank you for the Court’s consideration and courtesy with regard to this matter.

Respectfully submitted,

**LONDON FISCHER LLP**

/s/ Thomas Leghorn

Thomas A. Leghorn